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June 18, 2010

**VIA ECF**

Honorable James Orenstein  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Berkshire Settlements, Inc. v. Ashkenazi, No. 09 CV 0006 (FB) (JO)

Dear Judge Orenstein:

We represent John Hancock Life Insurance Company (USA) ("Hancock") in the above-referenced action. On May 28, 2010, the Court ordered counsel for Hancock and for defendant Mali Halpert ("Halpert") to confer and attempt to agree on the amount of fees and expenses Halpert is obligated to pay Hancock in connection with Hancock's efforts to obtain her deposition. The Court directed Hancock to file a statement of costs by June 18 if the parties could not agree.

The parties have discussed the issue but have not come to a resolution. Hancock is prepared to file its statement of costs today. However, yesterday Ms. Halpert's counsel contacted us and requested that we consent to a short extension of time to file the statement of costs so that the parties can further explore an amicable resolution. Hancock consents to this request.

Accordingly, we request that the deadline for Hancock to file a statement of costs, should it wish to do so, be extended through and including June 24, 2010.

Respectfully submitted,

/s/ Eric Post

Eric Post